



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAY 20 2009

REPLY TO THE ATTENTION OF:
E-19J

Christine Brunner, Project Leader
Eagle River-Florence Ranger District
Chequamegon-Nicolet National Forest
1247 East Wall Street
Eagle River, Wisconsin 54521

Re: Draft Environmental Impact Statement for the Proposed Grub Hoe Vegetation and Transportation Management Project on the Chequamegon-Nicolet National Forest, Eagle River – Florence Ranger District, Wisconsin – EIS No. 20090131

Dear Ms. Brunner:

The U.S. Environmental Protection Agency has reviewed the U.S. Forest Service's (USFS) Draft Environmental Impact Statement (EIS) for the above-mentioned project. Our review is pursuant to the National Environmental Policy Act, the Council on Environmental Quality regulations, and Section 309 of the Clean Air Act.

The purpose for the proposed activities is to implement land management activities consistent with the direction of the adopted 2004 Land and Resource Management Plan (Forest Plan) for the Chequamegon-Nicolet National Forest (Forest). Proposed management activities will address major gaps between desired future conditions as stated in the Forest Plan and current conditions found in the project area.

Project objectives include the following:

- Increase diversity of northern hardwood forest structure and composition;
- Reduce fragmentation in larger patches of northern hardwood forest;
- Improve aspen age class distribution;
- Improve aquatic ecosystems within the Pine River corridor;
- Contribute toward satisfying the demand for wood products; and
- Provide a transportation system which meets the long-term transportation needs of the Forest.

The draft EIS documents the analysis of four alternatives and the selection of Alternative B as the Proposed Action. The analysis indicates that minimal adverse effects to the biological and physical environment would result from the action alternatives provided management requirements and mitigation measures are implemented. The alternatives differ by the amounts

of proposed harvesting in aspen stands, spruce salvaging, road construction/reconstruction and decommissioning and biomass removal.

Based upon our review of the Draft EIS and discussions between Kathy Kowal of my staff and USFS personnel, we have assigned a rating of "Lack of Objections" to this Draft EIS. A summary of the rating system used in the evaluation of these documents is enclosed for your reference. We find the Proposed Action consistent with the Forest Plan, and we have no substantive comments. However, we recommend the Final EIS clarify the following two issues concerning non-native invasive plant species (NNIS).

Table 3.1 summarizes 10 current and foreseeable USFS projects within the cumulative effects analysis area (the District boundary). Section 3.4, Non-native Invasive Species, Cumulative Effects, indicates that one project was not included in Table 3.1 - the Nicolet All-terrain Vehicle (ATV) Route/Trail Designation Project (Project) - even though the designation of these roads as ATV routes and ATV-only trails carries a high risk of introducing and spreading NNIS across the eastern portion of the District. The analysis is unclear as to why this project was not included in Table 3.1. We recommend Table 3.1 be revised to include the potential risk of introduction or spread of NNIS within the cumulative effects analysis area from the Project.

Additionally, the NNIS Cumulative Effects Conclusions indicates that 1,385 acres would receive more sunlight as a result of temporarily opening up canopies, equating to 0.4 percent of the District landbase. The Proposed Action, Alternative B, would increase this amount by 0.2 percent. The discussion also indicates that, when added to the effects of past, present, and reasonably foreseeable actions, the effects of implementing any of the action alternatives would not be expected to result in appreciable adverse cumulative effects to the spread of NNIS. The Draft EIS is unclear as to what is represented by the 1,385 acres, and we recommend it should be clarified in the Final EIS.

Please send one copy of the Final EIS and Record of Decision to my attention once it becomes available. Should you have any questions regarding the contents of this letter, please do not hesitate to contact me or Kathleen Kowal of my staff at (312) 353-5206 or via email at kowal.kathleen@epa.gov.

Sincerely,



Kenneth A. Westlake
Supervisor, NEPA Implementation
Office of Enforcement & Compliance Assurance